

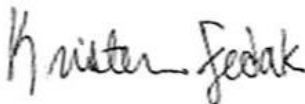
To whom it may concern:

I am submitting this request to ask for additional details related to exposure calculations within two EPA documents on to asbestos from contaminated vermiculite garden fertilizers:

1. EPA's 1985 "Exposure Assessment for Asbestos-Contaminated Vermiculite" document uses a "dust release rate" of 0.0643% which they state was "obtained by weighing a bag of garden fertilizer before and after pouring; some air movement was simulated." (Section 5.4.2 of document; pg 56). More details are requested on how the "dust release rate" was calculated, including:
 - a. What product was used to determine this rate? The document simply says "a bag of garden fertilizer"—what type of fertilizer was it? What was the composition/formula?
 - b. What was the protocol for the pouring and measuring?
 1. How was the weight of the bag considered?
 2. Was the activity only done once, or done multiple times and averaged?
 3. What type of container was the fertilizer poured into? How quickly was the pouring done? (i.e., did the pouring act adequately represent conditions of fertilizer application from the bag, such that the amount of dust released would be similar?)
 4. How was "air movement" simulated? What were the air conditions?
2. EPA's 2000 "Sampling and Analysis of Consumer Garden Products that Contain Vermiculite" used "Scotts Vermiculite" bought in San Antonio, TX and ran indoor product use simulations in a 10x10x10ft area.
 - a. What exact Scotts product is this? Is there an MSDS, bag label, or patent for this product that states the product composition?
 - b. EPA's justification in the document for the 10x10x10ft area is that it represented an average-sized shed/garage or greenhouse area where someone might use the lawn/garden fertilizers. How did they decide that was average? What type of ventilation did EPA determine is typical in most indoor work spaces, and how did the ventilation in this simulation area compare?

The documents I am referring to (EPA 1985, EPA 2000) are attached. If you have any questions please contact me via phone or email.

Thank you,



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